

GREENBLATT, PIERCE, ENGLE, FUNT & FLORES, LLC
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ATTORNEY FOR DEFENDANT

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

vs.

ERIK VON KIEL

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:
:

CRIMINAL NO. 14-149

ORDER

AND NOW, to wit this day of , 2014, upon consideration of the Defendant's Motion for Enlargement of Time to File Pretrial Motions, and after response by the Government, it is hereby **ORDERED, ADJUDGED, AND DECREED** that the Defendant's Motion for Extension of Time to File Pretrial Motions is GRANTED and it is ORDERED that Defendant's Pretrial Motions shall be due on: _____.

BY THE COURT:

HONORABLE JEFFREY L. SCHMEHL
United States District Court Judge

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
	:	CRIMINAL NO. 14-149
vs.	:	
	:	
ERIK VON KIEL	:	

DEFENDANT'S MOTION FOR EXTENSION OF TIME
TO FILE PRE-TRIAL MOTIONS

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Defendant, ERIK VON KIEL, by and through his counsel, MICHAEL J. ENGLE, ESQUIRE hereby moves this Honorable Court to GRANT the Defendant's Motion for Continuance of Trial, and asserts the following reasons therefore:

1. On or about March 27, 2014, the Government filed a six count Indictment against Dr. Von Kiel, which charged him with violations of 18 U.S.C. § 371, Conspiracy to Defraud the United States (one count), 26 U.S.C. § 7201, Attempting to Evade or Defeat Federal Tax (five counts), and 18 § U.S.C. 2, Aiding and Abetting.
2. Defendant is required by rule to file pre-trial motions within 14 days from his arraignment.
3. Trial is currently scheduled to commence on June 23, 2014.

4. Defense counsel recently received discovery from prior counsel, Martin Isenberg, Esq.
5. In order to ensure that the Defendant's constitutional right to a fair trial is protected, the Defense requires additional time to prepare pre-trial motions in this case.

WHEREFORE, the Defendant, ERIK VON KIEL, respectfully requests that this Honorable Court grant the Motion for Extension of Time to File Pre-Trial Motions.

RESPECTFULLY SUBMITTED:

SIGNATURE CODE: MJE5849
MICHAEL J. ENGLE, ESQUIRE
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I, MICHAEL J. ENGLE, ESQUIRE, HEREBY CERTIFY THAT I HAVE
FORWARDED BY ELECTRONIC FILING, A TRUE AND CORRECT COPY OF THE
FOREGOING MOTION FOR EXTENSION OF TIME TO FILE PRE-TRIAL MOTIONS TO
THE FOLLOWING PERSONS:

HONORABLE JEFFREY L. SCHMEHL
CHAMBERS
U.S. COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106

MARK B. DUBNOFF, AUSA
615 CHESTNUT STREET
SUITE 1250
PHILADELPHIA, PA 19106

SIGNATURE CODE: MJE5849
MICHAEL J. ENGLE, ESQUIRE
ATTORNEY FOR DEFENDANT

DATED: May 18, 2014